



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

TO: The Commission

FROM: Lisa J. Stevenson
Acting General Counsel

Kathleen M. Guith
Associate General Counsel for Enforcement

Stephen A. Gura
Deputy Associate General Counsel for Enforcement

BY: Mark Allen *MA*
Assistant General Counsel

Delbert K. Rigsby *DKR*
Attorney

SUBJECT: MUR 7132 (Michael David Pitts) - Pre-Probable Cause Conciliation Agreement

Attached is a conciliation agreement (Attach. 1) negotiated with Michael David Pitts ("Pitts" or "Respondent") which seeks to resolve knowing and willful violations of 52 U.S.C. § 30102(b)(3) and 11 C.F.R. § 102.15 that occurred when Pitts embezzled funds of Amedisys, Inc. PAC ("Amed PAC") and concealed the embezzlement.¹ In the negotiated agreement, Pitts admits to knowingly and willfully violating 52 U.S.C. § 30102(b)(3) and 11 C.F.R. § 102.15. Pitts is currently in federal prison for wire fraud for embezzling funds from Amedisys, Inc., the connected organization of Amed PAC.

¹ On May 10, 2017, the Commission found reason to believe as to Pitts and authorized pre-probable conciliation with Pitts. The Commission also referred Amedisys, Inc. and Amed PAC, the entities from which Pitts embezzled, to the Office of Alternative Dispute Resolution ("ADR"). On January 2, 2018, the Commission approved a settlement agreement with Amedisys, Inc. and Amed PAC. See Amedisys, Inc. *et al.* (Pre-MUR 596/ADR 826).

1
2
3
4
5
6
7
8
9
10
11
12 We believe the attached conciliation agreement represents a reasonable settlement under
13 the circumstances. Therefore, we recommend that the Commission accept the attached signed
14 conciliation agreement negotiated with Michael David Pitts, approve the appropriate letter, and
15 close the file.
16

17 **RECOMMENDATIONS:**
18

- 19 1. Accept the attached conciliation agreement with Michael David Pitts.
20
21 2. Approve the appropriate letter.
22
23 3. Close the file.
24
25
26
27

100044400015